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April 28, 2025

BY ECF

The Honorable Richard M. Berman
United States District Court
Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Courtroom 17B
New York, NY 10007

Re: United States v. Keonne Rodriguez and William Hill, No. 24 Cr. 82 (RMB)

Dear Judge Berman,

This is a joint request by the Government and the Defendants for a continuance of the pretrial motions schedule by 16 days.

As the Court may be aware, on April 7, 2025, the Deputy Attorney General Todd Blanche issued a “Memorandum on Ending Regulation by Prosecution” (the “Blanche Memo”), outlining the Justice Department’s new policies on prosecutions involving digital assets. On April 10, 2025, the Defendants wrote to the Acting United States Attorney for the Southern District of New York requesting the dismissal of the superseding indictment under the Blanche Memo, and on April 24, 2025, defense counsel met with the prosecutors and their supervisors in person at the U.S. Attorney’s Office to discuss this request.

The Defendants believe that a continuance of the pretrial motions schedule is warranted to permit Defendants to avoid the significant expense of preparing their motions while the Government determines its position in response to the Defendants’ letter. Without expressing any views on the merits of the Defendants’ letter, the Government agrees to this adjournment. If the case were to move ahead to trial, the requested continuance would have no impact on the trial date, which is still over six months away. The parties accordingly request that the Court adopt the following new schedule for pretrial motions: motions due May 29, 2025; responses due June 26, 2025; and replies due July 10, 2025. This would extend the deadlines by a little over two weeks from the current schedule, under which motions are due on May 13, 2025, with responses due on June 10 and replies



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due on June 24. The Court previously granted the parties' joint request for a short extension of the motions deadline from May 9, 2025, to May 13, 2025, making this the second request for an extension.

Respectfully submitted,

/s/ Roger A. Burlingame
Roger A. Burlingame

Enclosures

cc: AUSAs Andrew Chan, David R. Felton, Cecilia Vogel (by ECF)

Michael Krouse, Esq. (Counsel for Defendant Keonne Rodriguez) (by ECF)

Matthew Mazur, Esq. and Jeffrey Brown, Esq. (Counsel for Defendant William Lonergan Hill) (by ECF)